

HAND DELIVERED

STATE OF WISCONSIN
GOVERNMENT ACCOUNTABILITY BOARD

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GOVERNMENT
ACCOUNTABILITY BOARD

The Complaint of the Democratic Party of Wisconsin,

By Jacob Hajdu,

Complainant,

against

Kim Simac,

Respondent

VERIFIED COMPLAINT

On behalf of the Democratic Party of Wisconsin, I, primarily based on public records, but also on information and belief, hereby allege as follows:

1. This Complaint is brought against Kim Simac pursuant to Wisconsin GAB Chapter 2.07, Wisconsin Administrative Code.

2. I am a qualified elector in and resident of the State of Wisconsin. I am the Political Director of the Democratic Party of Wisconsin, 110 King Street, Suite 203, Madison, Wisconsin 53703, on behalf of which I bring this Complaint.

3. Respondent maintains an address at 3860 Kula Vista Dr, Eagle River WI 54521.

4. On or about June 21, 2011, Respondent filed nomination papers containing 711 signatures with the Government Accountability Board to be placed on the ballot for the July 19, 2011 recall election in the 12th State Senate District.

5. Respondent's nomination papers contained a total of 101 signatures with insufficiencies pursuant to GAB Chapters 2.05 and 2.07, Wisconsin Administrative Code, bringing the total number of valid signatures submitted down to 610. A copy of the insufficient signatures is attached hereto and incorporated herein as Exhibit "A."

6. Complainant respectfully submits that these facts warrant the Board's attention, and the Board should take prompt action to eliminate from the nomination papers filed by Respondent all signatures that are insufficient pursuant to GAB Chapters 2.05 and 2.07, Wisconsin Administrative Code.

7. Furthermore, Respondent's Declaration of Candidacy form fails to identify a municipality. This failure also warrants the Board's attention, and the Board should refuse to accept the Declaration of Candidacy form filed by Respondent.

I, , being first duly sworn upon oath, state that I personally read the above complaint and that the above allegations are true and correct based upon my personal knowledge and my review of public records and, as to those allegations stated on my information and belief, I believe them to be true.


Dated this 24 day of June, 2011.

Respectfully submitted,



Jacob Hajdu, Political Director
Democratic Party of Wisconsin

Subscribed and sworn to before me
this 24th day of June, 2011.



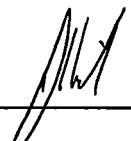
Lura L. Anders

Notary Public

My commission expires: 12-2-2012

CERTIFICATE OF SERVICE

I, , hereby certify that on this 24 day of June, 2011, a true and correct copy of this Complaint was forwarded via U.S. Mail, first class postage prepaid and properly addressed, to Kim Simac, Respondent, 3860 Kula Vista Dr, Eagle River WI 54521.



Jacob Hajdu, Complainant

Summary of Insufficiencies in Simac's Nomination Petitions

RECEIVED

Date of Signing	2/2/2024	Page 4	Page 4
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Exhibit "A"
Summary of Insufficiencies in Simac's Nomination Petitions

First Name	Last Name	Address	Mailing City	Municipality	Date of Signing	Page	Line	Signator Insufficiency	Circulator Insufficiency
Karen	Dean	5085 Cooper Ln	Eagle River	Eagle River	6/18/11	105	5	should be Sugar Camp	
		1627 Lighthouse Lodge Rd	Eagle River	Eagle River	6/18/11	113	3	should be Three Lakes	
Ronald	Hoepner	4450 Chain O Lakes	Eagle River	Eagle River	6/18/11	109	2	should be Washington	
Phyllis	Schuh	5391 Manor Rd	Rhinelander	Pine Lake	6/18/11	1	1		no municipality
James	Schuh	5391 Manor Rd	Rhinelander	Pine Lake	6/18/11	1	2		no municipality
Kent	Knuth	6369 Cty Hwy J	St Germain	Newbold	6/17/11	5	1		no municipality
J	W	2271 Townhall Rd	Eagle River	Washington	6/17/11	5	2		no municipality
Patricia	Gates	420 Michigan St #4	Eagle River	Eagle River	6/17/11	5	3		no municipality
Judy	Langhoff	1711 Forest Ln	Eagle River	Washington	6/17/11	5	4		no municipality
Jack	Langhoff	1711 Forest Ln	Eagle River	Washington	6/17/11	5	5		no municipality
S		9785 Yawkey St	Hazelhurst	Hazelhurst	6/18/11	12	7		
Nelle	Ellenberger	1420 Watersmeet Lake Rd	Eagle River	Lincoln	6/18/11	23	1		no municipality
Lois	Ellenberger	1206 Perch Lake Rd	Eagle River	Lincoln	6/18/11	23	2		no municipality
William		1570 McKinley Blvd	Eagle River	Lincoln	6/18/11	23	3		no municipality
Kathleen	M	1570 McKinley Blvd	Eagle River	Lincoln	6/18/11	23	4		no municipality
Diana	Wheeler	7411 Wheeler Island RD	Three Lakes	Three Lakes	6/17/11	30	1		no municipality
J	Chamberlain	5800 Zerndu	Eagle River	Cloverland	6/17/11	30	2		no municipality
Faye	Parsons	1339 Sunset Rd	Eagle River	Cloverland	6/17/11	30	3		no municipality
Florence	Brah	16661 Tuttle Rd	Eagle River	Hiles	6/17/11	30	4		no municipality
Thomas	Brah	16661 Tuttle Rd	Eagle River	Hiles	6/17/11	30	5		no municipality
R. C.	Parsons	1339 Sunset Rd	Eagle River	Cloverland	6/17/11	30	6		no municipality
		3924 Hwy 17 N	Eagle River	Washington	6/17/11	30	7		no municipality
Paula	Visner	6045 Beaver Tr	Eagle River	Cloverland	6/17/11	30	8		no municipality
James	Lynn	6335 Nelson Lake Rd	Eagle River	Cloverland	6/15/11	35	1		no municipality
Marion	Koteck-Lynn	6335 Nelson Lake Rd	Eagle River	Cloverland	6/15/11	35	2		no municipality
		1590 Wilderness Tr	Eagle River	Cloverland	6/16/11	35	3		no municipality
Betty	Conant	6325 Nelson Lake Rd	Eagle River	Cloverland	6/16/11	35	4		no municipality
Lois	Conant	1606 Wilderness Trail	Eagle River	Cloverland	6/17/11	35	5		no municipality
Connie	Campbell	1951 McKinley Blvd	Eagle River	Lincoln	6/14/11	39	1		no municipality
Mike	Campbell	1951 McKinley Blvd	Eagle River	Lincoln	6/15/11	39	2		no municipality
Patrick	Kenny	4324 Daisy Ln	Eagle River	Lincoln	6/15/11	39	3		no municipality

Exhibit "A"

Summary of Insufficiencies in Simac's Nomination Petitions

First Name	Last Name	Address	Mailing City	Municipality	Date of Signing	Page	Line	Signator Insufficiency	Circulator Insufficiency
Debra	Kenny	4324 Daisy Ln	Eagle River	Lincoln	6/15/11	39	4		no municipality
Kathleen	Oatman	319 S 4th St	Eagle River	Eagle River	6/15/11	39	5		no municipality
Pat	Cram	325 S 4th St	Eagle River	Eagle River	6/15/11	39	6		no municipality
Melissa	Cram	325 S 4th St	Eagle River	Eagle River	6/15/11	39	7		no municipality
Kathy	Cieszynski	4691 Dyer Rd	Eagle River	Lincoln	6/15/11	39	8		no municipality
		5152 Hwy G	Eagle River	Lincoln	6/17/11	39	9		no municipality
Theresa	Knitt	6369 Hwy J	St Germain	Newbold	6/17/11	39	10		no municipality
Andrew	Loduha	5505 Mohawk Rd	Rhinelander	Pine Lake	6/15/11	52	1		no municipality
Lisa	Loduha	5505 Mohawk Rd	Rhinelander	Pine Lake	6/17/11	52	2		no municipality
Judy	Clure	6513 Boot Lake Rd	Eagle River	Cloverland	6/15/11	77	1		no municipality
Donald	Pfeiffer	3557 Colburn Rd	Rhinelander	Pelican	6/15/11	77	2		no municipality
Thomas		16890 Shady Ln	Eagle River	Hiles	6/15/11	77	3		no municipality
S	E	2800 Old Camp Rd	Eagle River	Phelps	6/15/11	77	4		no municipality
Tami	E	2800 Old Camp Rd	Eagle River	Phelps	6/15/11	77	5		no municipality
Richard	Cherney	2904 Taylor Ln	Eagle River	Phelps	6/15/11	77	6		no municipality
Theresa	Cherney	2904 Taylor Ln	Eagle River	Phelps	6/15/11	77	7		no municipality
Angelique	Sullivan	2945 Pine Island Lake Rd	Eagle River	Conover	6/15/11	82	1		no municipality
Ken	Sullivan	2945 Pine Island Lake Rd	Eagle River	Conover	6/15/11	82	2		no municipality
Paul	Riehl	3300 Deerskin Rd	Eagle River	Washington	6/15/11	82	3		no municipality
		5323 Rangeline Rd	Eagle River	Lincoln	6/15/11	82	4		no municipality
James	Cuffe	5562 Zeman Rd	Eagle River	Cloverland	6/15/11	82	5		no municipality
Marlene	Cuffe	5562 Zeman Rd	Eagle River	Cloverland	6/15/11	82	6		no municipality
John	Mi	1406 Halberstadt Rd	St Germain	St Germain	6/15/11	82	7		no municipality
Linda	Kaiser	7148 Timber Ln	Sugar Camp	Sugar Camp	6/15/11	82	8		no municipality
Robert	Meiz	5440 Hwy 70	Eagle River	Cloverland	6/15/11	82	9		no municipality
		3061 N Carpenter Lake	Eagle River	Washington	6/15/11	82	10		no municipality
Elmer John	Nelsen	11430 Youngs Ln	Three Lakes	Hiles	6/15/11	83	1		no municipality
Roger	Brown	11847 Seven Mile Lake Ln	Three Lakes	Hiles	6/15/11	83	2		no municipality
Robert	Winterhorse	11434 Young Ln	Three Lakes	Hiles	6/15/11	83	3		no municipality
Melissa	Werner	7090 Timbershore Ln	Three Lakes	Three Lakes	6/15/11	83	4		no municipality
Rosalind	Olrikowiz	7621 Hwy X	Three Lakes	Three Lakes	6/16/11	83	5		no municipality
John	Robert	7424 Halverson Rd	Three Lakes	Three Lakes	6/16/11	83	6		no municipality
Raymond	Peterson	3484 Cottage Ln	Eagle River	Washington	6/16/11	83	7		no municipality
Kay	Thomas	9220 Longs Rd	Sayner	Plum Lake	6/14/11	84	1		no municipality

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Charles	Duller	4294 Martens Rd	Eagle River	Lincoln	6/14/11	84	2		no municipality
Debra	Johnson	4063 Church Rd	Conover	Conover	6/14/11	84	3		no municipality
		3679 Town Line Rd	Eagle River	Lincoln	6/15/11	84	4		no municipality
Ingrid	Decker	4234 Deerskin Rd	Pheips	Pheips	6/15/11	85	1		no municipality
Patrick	Decker	4234 Deerskin Rd	Pheips	Pheips	6/15/11	85	2		no municipality
George	Gullan	4294 Martens Rd	Eagle River	Lincoln	6/15/11	86	1		no municipality
		4293 Martens Rd	Eagle River	Lincoln	6/15/11	86	2		no municipality
Jake		1166	Eagle River	Lincoln	6/15/11	87	1		no municipality
Rowella	Tinstman	3165 Campground RD	Eagle River	Washington	6/16/11	87	2		no municipality
John	Schmidt	7680 Wheeler Island Rd	Three Lakes	Three Lakes	6/16/11	87	3		no municipality
Anne	Hansen	8462 Hwy H	Eagle River	Sugar Camp	6/16/11	87	4		no municipality
Barbara	Schuman	2997 wausau RD	Rhinelander	Crescent	6/16/11	101	1		no municipality
Joanne	Dart	2968 Wausau Rd	Rhinelander	Crescent	6/16/11	101	2		no municipality
Bernie	Dart	2968 Wausau Rd	Rhinelander	Crescent	6/16/11	101	3		no municipality
Vicky	Rohl	2962 Wausau Rd	Rhinelander	Crescent	6/16/11	101	4		no municipality
Joel	Rohl	2962 Wausau Rd	Rhinelander	Crescent	6/16/11	101	5		no municipality
Pat	Laska	3047 Wausau Rd	Rhinelander	Crescent	6/17/11	101	6		no municipality
Agnes	Laska	2926 Wausau Rd	Rhinelander	Crescent	6/17/11	101	7		no municipality
Randy	Blur	2947 Wausau RD	Rhinelander	Crescent	6/18/11	101	8		no municipality
Linda	Koneman	2947 Wausau RD	Rhinelander	Crescent	6/18/11	101	9		no municipality